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18 **UNITED STATES DISTRICT COURT**  
19 **DISTRICT OF NEVADA**

20 FEDERAL TRADE COMMISSION,

21 Plaintiff,

22 v.

23 AMG Services, Inc., et al.,

24 Defendants, and

25 Park 269, LLC, et al.,

26 Relief Defendants.  
27

28 Case No. 2:12-cv-536

**MOTION FOR ORDER  
DIRECTING TURNOVER OF  
ASSETS**

1  
2 On September 30, 2016, the Court entered judgment in the FTC's favor in this proceeding, ordering  
3 the Tucker Defendants<sup>1</sup> to pay to the FTC \$1,266,084,156 (plus prejudgment interest), ordering Kim  
4 Tucker to pay to the FTC \$19,072,774, and ordering Park 269, LLC to pay to the FTC \$8,000,000. (ECF  
5 No. 1057 at 29.)

6 Currently, several third parties hold assets belonging to the Tucker Defendants and Kim Tucker  
7 pursuant to the Court's earlier Asset Freeze Order (ECF No. 960). The list of Scott Tucker's entities  
8 whose assets have been frozen by the Court was thereafter twice augmented by the Court. (ECF Nos.  
9 1024, 1030.<sup>2</sup>)

10 The FTC respectfully requests that the Court enter the attached order, which would direct third  
11 parties to turn over frozen assets to the FTC, in partial settlement of the judgment amounts. (The FTC did  
12 not request this relief in its proposed order for summary judgment because there was no asset freeze order  
13 in place at the time the summary judgment motion and proposed order for summary judgment were filed).

14 Dated: October 3, 2016

15 /s Nikhil Singhvi

16 Nikhil Singhvi  
17 Jason D. Schall  
18 Helen P. Wong  
19 Ioana Rusu  
Courtney A. Estep  
Thomas E. Kane

20 *Attorneys for Plaintiff*  
*Federal Trade Commission*

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24  
25 <sup>1</sup> The "Tucker Defendants" are Scott A. Tucker, AMG Capital Management, LLC; Level 5  
26 Motorsports, LLC; Black Creek Capital Corporation; and Broadmoor Capital Partners. (See ECF  
27 No. 1057 at 1:10-12.)

28 <sup>2</sup> Based on information available to the FTC at this time, the FTC does not seek to collect assets  
directly from Caribbean Medical Brokers, Inc., Eyeverify LLC, or Think Big Partners LLC.

## **CERTIFICATE OF SERVICE**

I, Nikhil Singhvi, certify that, as indicated below, all parties were served by ECF with the **MOTION FOR ORDER DIRECTING TURNOVER OF ASSETS** filed with the Court.

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October 3, 2016

/s Nikhil Singhvi  
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